



1997 AND 2003 COMMENT ANALYSIS REPORT

JUNEAU ACCESS IMPROVEMENTS ENVIRONMENTAL IMPACT STATEMENT

STATE PROJECT NUMBER: 71100

FEDERAL PROJECT NUMBER: STP-000S (131)

Prepared for

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Appendix A

Database Reports

LIST OF ACRONYMS

CAR	Comment Analysis Report
DEIS	Draft Environmental Impact Statement
DOT&PF	Alaska Department of Transportation and Public Facilities
EIS	Environmental Impact Statement
ID#	Unique identifier
KLGO	Klondike Gold Rush
NEPA	National Environmental Policy Act
SDEIS	Supplemental Draft Environmental Impact Statement

1.0 Introduction

The Alaska Department of Transportation and Public Facilities (DOT&PF) prepared a Draft Environmental Impact Statement (DEIS) in 1997 that evaluated improved surface transportation within the Lynn Canal /Taiya Inlet corridor. Alternatives analyzed included a No Build, East Lynn Canal Highway, and a Marine alternative with four options, two with ferry terminals at Auke Bay and two with ferry terminals in Berners Bay.

During 1998 and 1999 further analysis of the 1997 alternatives was conducted including analysis of additional alternatives. On January 24, 2000, the State of Alaska announced that its preferred alternative was the East Lynn Canal route. Further work on the DEIS was suspended until December 2002, when newly elected Governor Murkowski ordered the completion of the EIS. A January 2003 re-evaluation of the DEIS by DOT&PF concluded that a Supplemental Draft Environmental Impact Statement (SDEIS) is required to update and augment the 1997 DEIS. A Notice of Intent to prepare the SDEIS was published in the Federal Register on March 11, 2003.

The SDEIS and Final Environmental Impact Statement (FEIS) will update the 1997 DEIS by: updating information for all 1997 DEIS alternatives; reevaluating the range of reasonable alternatives; updating the socioeconomic data and projections; augmenting previous technical studies with new information utilizing improved analysis methods; and insuring that the SDEIS and EIS are in compliance with new laws and regulations that have been enacted since 1997.

This Comment Analysis Report (CAR) will serve as the documentation of the 1997 and 2003 public and agency comments and will be the basis for a comment response document to be included in the Juneau Access Improvements SDEIS. A separate CAR and comment response document will be included in the final EIS to serve as the comment and response summary document for the SDEIS comment period.

1.1. DEIS Public Comment Period

In February 1997, cooperating agencies were requested to review the preliminary DEIS and provide their comments before the DEIS was released to the public. The DEIS was released in June 1997. The public comment period ran from June 23 to December 15, 1997. During the comment period public testimony was taken at public meetings held in Juneau, Skagway, Haines, Anchorage, Fairbanks, Kenai, and Ketchikan, Alaska.

1.2. SDEIS Scoping Comment Period

The SDEIS scoping comment period began when the Notice of Intent to prepare the SDEIS was published in the *Federal Register* on March 11, 2003 and ended on April 18, 2003. Public scoping meetings were conducted in Juneau, Skagway, and Haines, Alaska on April 8, 9, and 10, 2003 (respectively). An agency scoping meeting was held on April 14, 2003. The scoping meetings were held to solicit comments on the range of alternatives to be studied in the SDEIS and the need for additional field studies or technical reports. Comments received during the 2003 scoping efforts are summarized in the Scoping Summary Report (McDowell, June 2003).

1.3. Response to Public Comments

The National Environmental Policy Act (NEPA) requires that all substantive comments received on a DEIS be included in an FEIS. The FEIS must include responses to the comments and if changes are made to a DEIS as a result of the comments, indicate where the changes were made in the document. The Juneau Access Improvements SDEIS will include responses to substantive comments received during the 1997 DEIS comment period and the 2003 scoping period.

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2.0 Comment Analysis Methods

All comments are treated equally, not weighted by organizational affiliation or other status. The emphasis is on the content of the comment regardless of the number of comments received on an issue. All comments are catalogued in a Microsoft Access database.

2.1. Comment Coding

The comment coding process is described in this sub-section and presented graphically in Figure 2-1 at the end of this sub-section. All letters, comment forms, and transcripts of public hearings from 1997 and 2003 are date stamped and given a unique identifier (ID#). The following demographic information is identified for each comment and entered into the database.

- Association (agency, group, or citizen)
- Name of commenter
- Address, city, state, and zip code

The type of comment submission (letter or public testimony) is entered for each entity. In some cases, both a letter and a record of public testimony exist for a single individual. Both submissions are identified with a unique ID# and link back to the individual's name.

The comments are read to identify substantive comments. Letters or public testimonies that only identify a preferred alternative are acknowledged and the demographic information is entered into the database. Identification of a desired alternative alone is not considered a substantive issue. Substantive content consists of assertions, suggested alternative structures or actions, additional data and analysis requests, clarification requests, and editorial corrections and comments on the project NEPA process.

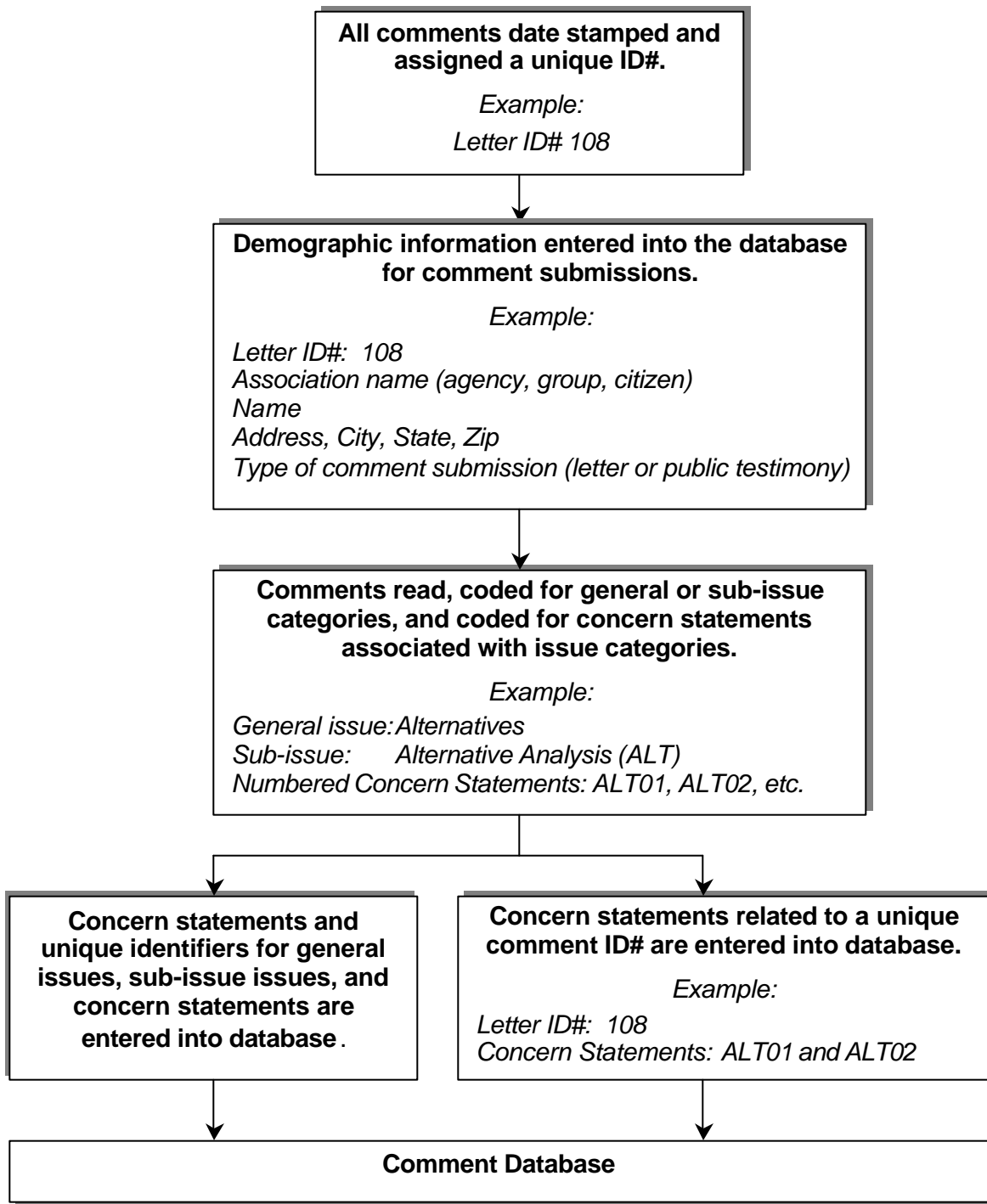
Substantive comments are grouped by like general or sub-issues and summarized by a concern statement. Concern statements are grouped by general or sub-issues and given unique codes for database entry. The general issues and sub-issues are listed below. The three-letter code for each general issue category with no sub-issues or sub-issue category is shown in parentheses. It should be noted that the issue categories appear alphabetically in database printouts not by general issue category.

- **Alternatives** This general issue category includes the following sub-issues categories:
 - Alternative Analysis (ALT)
 - Alternative Descriptions (DSP)
 - Avalanche (AVA)
 - Capacity (CAP)
 - Construction (CST)
 - Operations (OPR)
 - Traffic (TRA)
- **Biological Environment** –This general issue category includes the following sub-issue categories:
 - Fish (FSH)
 - Steller Sea Lions (SSL)
 - Wetlands (WET)
 - Wildlife (WLD)
 - Bald Eagles (EAG)

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- **Historic/Archaeological/Cultural Resources (HIS)** – There are no sub-issue categories associated with this general issue category.
 - **Land Use (LAN)** – There are no sub-issue categories associated with this general issue category.
 - **Miscellaneous (MSC)** – There are no sub-issue categories associated with this general issue category.
 - **Mitigation (MIT)** – There are no sub-issue categories associated with this general issue category.
 - **Physical Environment** – This general issue category includes the following sub-issue categories:
 - Geology (GEO)
 - Hydrology (HYD)
 - Landslides (LNS)
 - Visual (VIS)
 - Water Quality (WTR)
 - Wild and Scenic Rivers (RIV)
 - Noise (NOI)
 - **Purpose and Need (PRP)** –There are no sub-issue categories associated with this general issue category.
 - **Secondary and Cumulative Effects (SCC)** –There are no sub-issue categories associated with this general issue category.
 - **Socioeconomics (SEC)** –There are no sub-issue categories associated with this general issue category.

Concern statements with an associated general or sub-issue code and a concern statement number are entered into the database. Concern statements retain their relationship with comment letters.

Figure 2-1. Comment Coding Process.



3.0 Comment Analysis

3.1. *Geographical Distribution of Comments*

The distribution of substantive comment submissions (e.g., letter, fax, email) among U.S. states was essentially the same between 1997 and 2003, with the majority of comments being received from Alaska (Figure 3-1). The distribution of substantive comment submissions by Alaska communities varied between 1997 and 2003 (Figure 3-2). In 1997, 222 comment submissions were received from Juneau but dropped to 59 comment submissions in 2003. Haines comment submissions had a similar pattern with 63 submissions received in 1997 and 22 submissions in 2003. All other communities, with the exception of Sitka and Skagway, exhibited the same pattern as Juneau and Haines with more comment submissions received in 1997 than 2003.

Skagway exhibited an opposite pattern with 24 comment submissions in 1997 and 220 in 2003. (Note: 130 of the 220 Skagway submissions were individual signatures on a single letter.) No comments were received from Sitka in 1997 and 5 were received in 2003.

3.2. *Distribution of Substantive Comments*

Figure 3-3 illustrates the distribution of the 1997 and 2003 substantive comments by the 10 general issue categories discussed in Section 2.1 of this document. In 1997 and 2003, the Alternative, Physical Environment, Purpose & Need, and Secondary & Cumulative Effects issue categories generated similar numbers of substantive comments. The Biological Environment, Cultural Resources, Land Use, and Miscellaneous issue categories all generated more comments in 2003 than in 1997. The Socioeconomic issue category generated considerably more comments in 1997 than 2003 and the Mitigation issue category also generated more comments in 1997 than 2003.

3.3. *Summary of Substantive Comments*

Concern statements associated with the 1997 and 2003 comments are presented by general issue category in Appendix A. Overviews of the range of public concerns within an issue category are presented below.

Alternative Analysis (ALT). The one overall theme to the alternative analysis comments was that additional data should be included in the alternative analyses (e.g., costs of future highway upgrades, how foot passengers on ferries would be accommodated under highway alternatives, discussion of improvements to the Glacier Highway, etc.). Concern statements also requested that the West Lynn Canal and Taku alternatives be further analyzed.

Alternative Descriptions (DSP). There were three overall themes to the alternative description comments. The first requested that additional information on maintenance stations, visitor services, and the terminus of the road in Skagway be included in the road alternative description. The second requested additional information on ferries and ferry terminals. The third requested additional information on how ferries would operate during construction of a road and during maintenance periods or breakdowns for all alternatives with a ferry component.

Avalanche (AVA). The avalanche comments requested more information on avalanche areas and avalanche mitigation.

Bald Eagles (EAG). There were two overall themes to the bald eagle comments. The first identified the need for additional information on nest locations and the abundance of bald eagles in the project area. The second identified potential impacts of the road alternative that need to be resolved in the project mitigation plan

Capacity (CAP). The capacity comments requested clarification of the capacity estimates for the ferry system referenced in technical reports and sections of the DEIS.

Construction (CST). There were two overall themes to the construction comments. The first identified the need for additional information in the document regarding material sites and the fate of excess material. The second identified construction activities that should be included in impact analyses. In addition, concern statements requested that a construction timeline and a comparison of energy usage required for construction for each alternative be included in the document.

Fish (FSH). There were three overall themes to the fish comments. The first suggested that information on minimizing highway and bridge impacts to fish bearing streams be included in the document. The second suggested that additional information and an essential fish habitat assessment be included in the fish impacts analysis. The third identified the need to update the anadromous stream listing in the document.

Geology (GEO). The geology comments requested clarification of statements made in the 1997 DEIS regarding the suitability of rock and impacts to soils. The one concern statement received questioned the logic of building a road on soil that was identified as unsuitable for development due to its poor soil limitation rating.

Historic/Archaeological/Cultural Resources (HIS). There were two overall themes to historic/archaeological/cultural resources comments. The first identified the need for consultation with Native groups regarding cultural resources. The second identified the need for more detailed information on identified sites and the potential impacts to them.

Hydrology (HYD). The hydrology comments suggested that potential impacts of a road on slope runoff and the bridge structure effects on floodplains be assessed.

Land Use (LAN). There were three overall themes to the land use comments. The first noted that alternatives should be in compliance with existing land management plans in the project area. The second identified the need to further explain 4(f) resources in the project area and potential use of 4(f) land. The third identified potential external actions to the proposed project for inclusion in secondary and cumulative effect analyses.

Landslides (LNS). The landslide comment stated that landslide dangers in the project corridor have not been adequately addressed.

Miscellaneous (MSC). This general issue captures comments that do not easily fit into another category. It also includes comments that address very specific errors in the DEIS.

Mitigation (MIT). This general issue captures comments pertaining to the need to develop mitigation measures for identified impacts of the alternatives.

Noise (NOI). The comments identified the need to expand the noise analysis.

Operations (OPR). There were three overall themes to the operations comments. The first suggested that information be included to explain how reasonable highway or ferry service would be maintained during times of inclement weather. The second suggested that information be included on maintenance costs. The third identified the need to include information on how emergency response would be handled for public safety and potential hazardous material spills.

Purpose and Need (PRP). Comments identified the need to clarify the purpose and need statements and provide a discussion on how alternatives either meet or do not meet the purpose and need criteria. The one concern statement received questioned the validity of including reduced cost in the purpose and need.

Secondary and Cumulative Effects (SCC). There were two overall themes to the secondary and cumulative effect comments. The first identified indirect effects that should be included in the analyses. The second identified external actions to the proposed project that should be included in the cumulative effect analyses.

Socioeconomics (SEC). There were six overall themes to the socioeconomic comments. The first identified the need to further assess the economic impacts of the alternatives on the Alaska Marine Highway System and southeast communities (e.g., net loss/gain jobs, changes in tourism industry, etc.). The second identified numerous areas where the cost information needs to be clarified or new cost assessments need to be included in the analysis. The third suggested that population growth rates, demographics, and public opinion were outdated when the DEIS was published in 1997. The fourth suggested that the 1994 household survey was biased and the sample size was too small. The fifth criticizes the methods and conclusions of the 1997 User Benefit Analysis. The sixth identified the need for clarification of the funding sources for the proposed project. In addition, a concern statement identified the need to discuss tourism statistics and the effects of a road on tourism.

Steller Sea Lions (SSL). Comments on Steller sea lions identified the need for additional information on the use of haulouts in Lynn Canal, information on sea lion reactions to human disturbance, and inclusion of mitigation measures for potential impacts in the document.

Traffic (TRA). There were two overall themes to the traffic comments. The first questioned the accuracy of traffic estimates presented in the 1997 DEIS. The second requested the addition of traffic estimates for RVs and commercial traffic under different alternatives. In addition, comments requested that the potential for highway congestion and the effects of increased ferry traffic be addressed in the analysis.

Visual (VIS). The one overall theme to the visual comments is that the visual impacts of the road alternative were not adequately addressed in the 1997 DEIS. One concern statement requested that a US Forest Service landscape architect be involved during the project planning stage.

Water Quality (WTR). The one overall theme of the water quality comments identified the need to expand the analysis to address potential water quality impacts from road construction and maintenance and from external actions to the project such as increased recreational usage.

Wetlands (WET). The one overall theme to the wetland comments criticized the wetland assessment method and wetland mapping in the 1997 DEIS. In addition, concern statements identified the need to update mitigation options and to clarify information on wetland bridge crossings.

Wild and Scenic Rivers (RIV). The overall theme to the Wild & Scenic river comments suggested clarification of how a road would affect the status of a Wild & Scenic river and how impacts would be mitigated.

Wildlife (WLD). There were two overall themes to the wildlife comments. The first identified additional species and information that should be included in the analysis. The second questioned the use of the habitat capability model for predictive purposes and the choice of indicator species.

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Figure 3-1. Comment Distribution by U.S. State 1997:2003

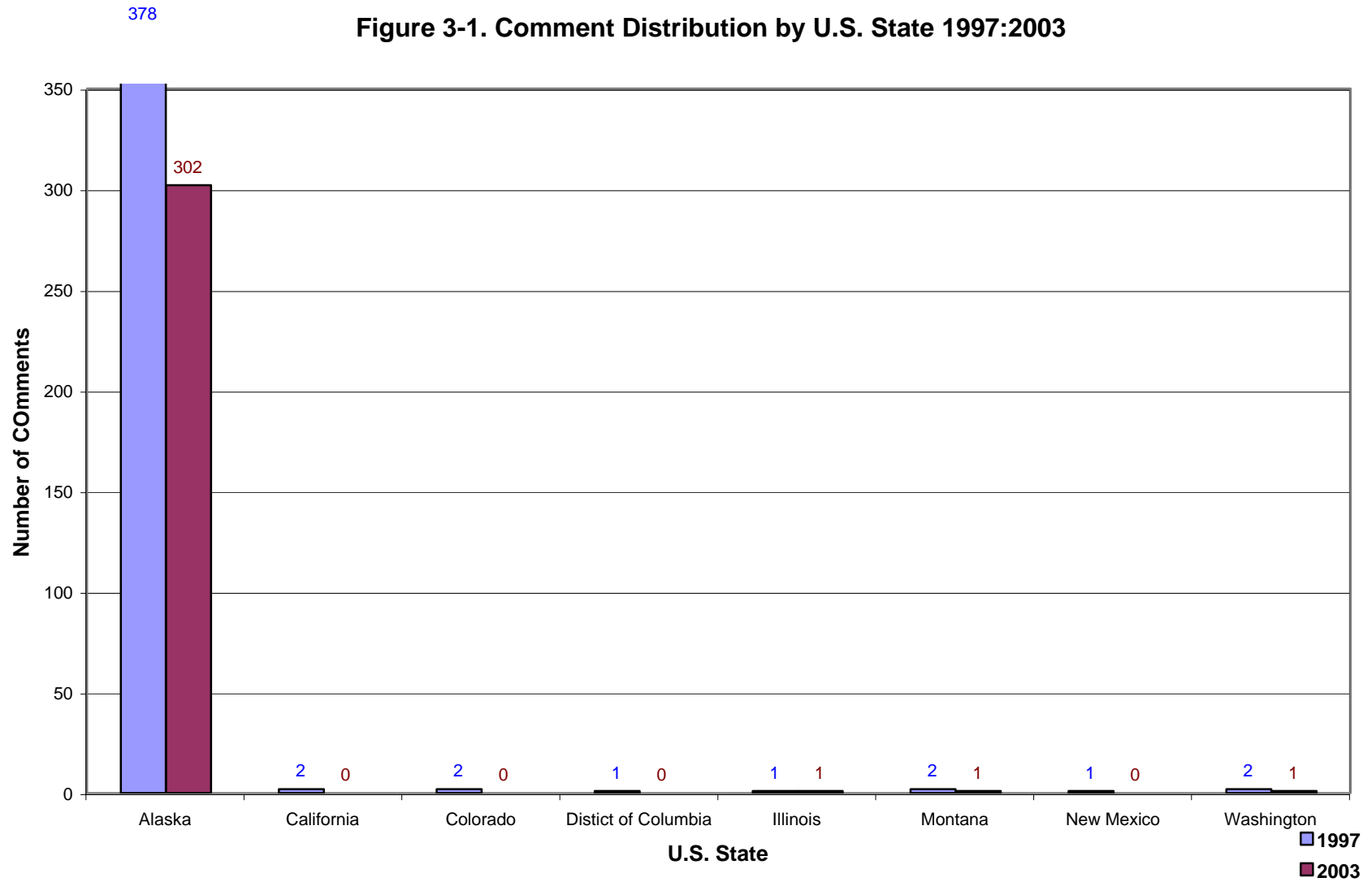


Figure 3-2. Comment Distribution by Alaskan Communities

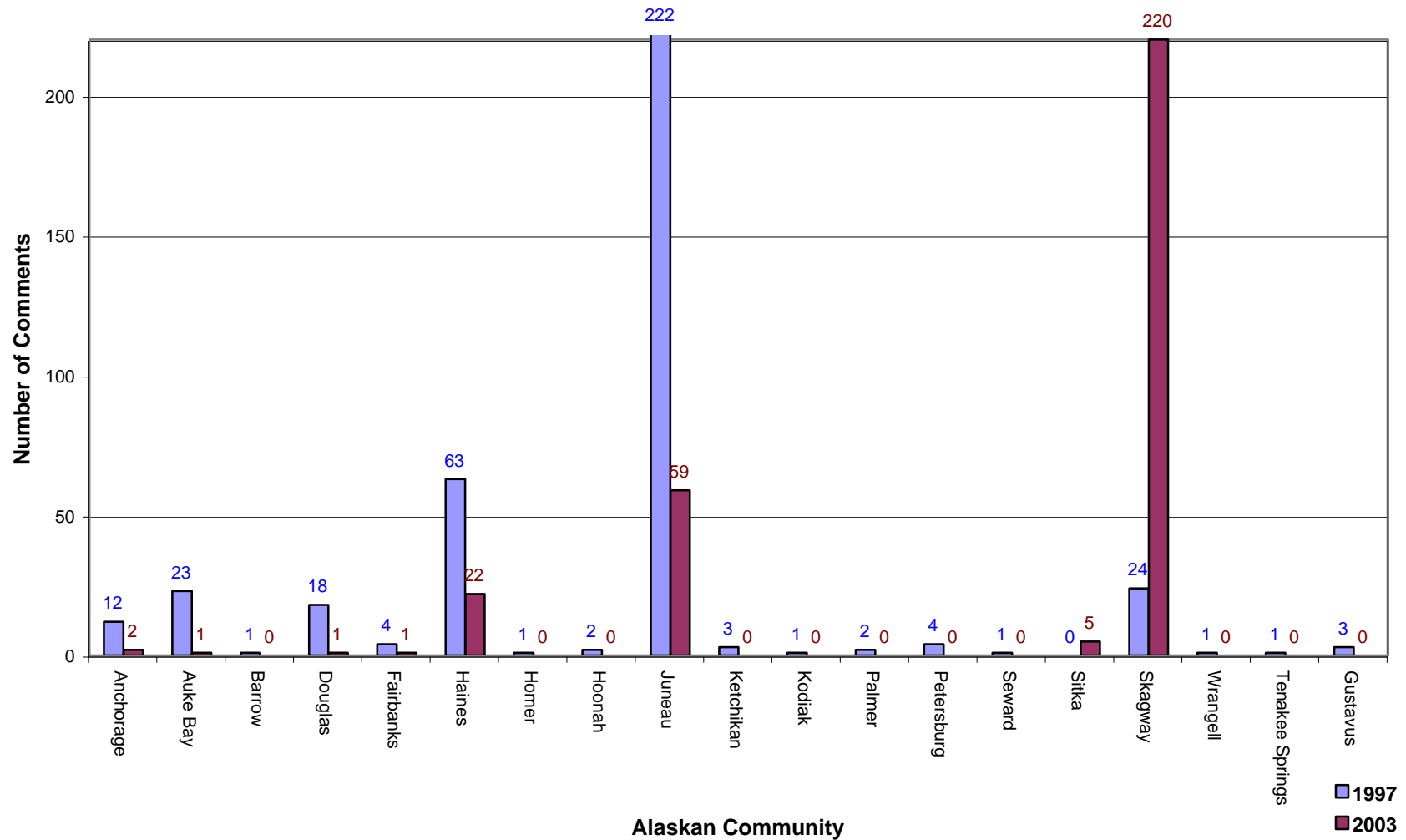
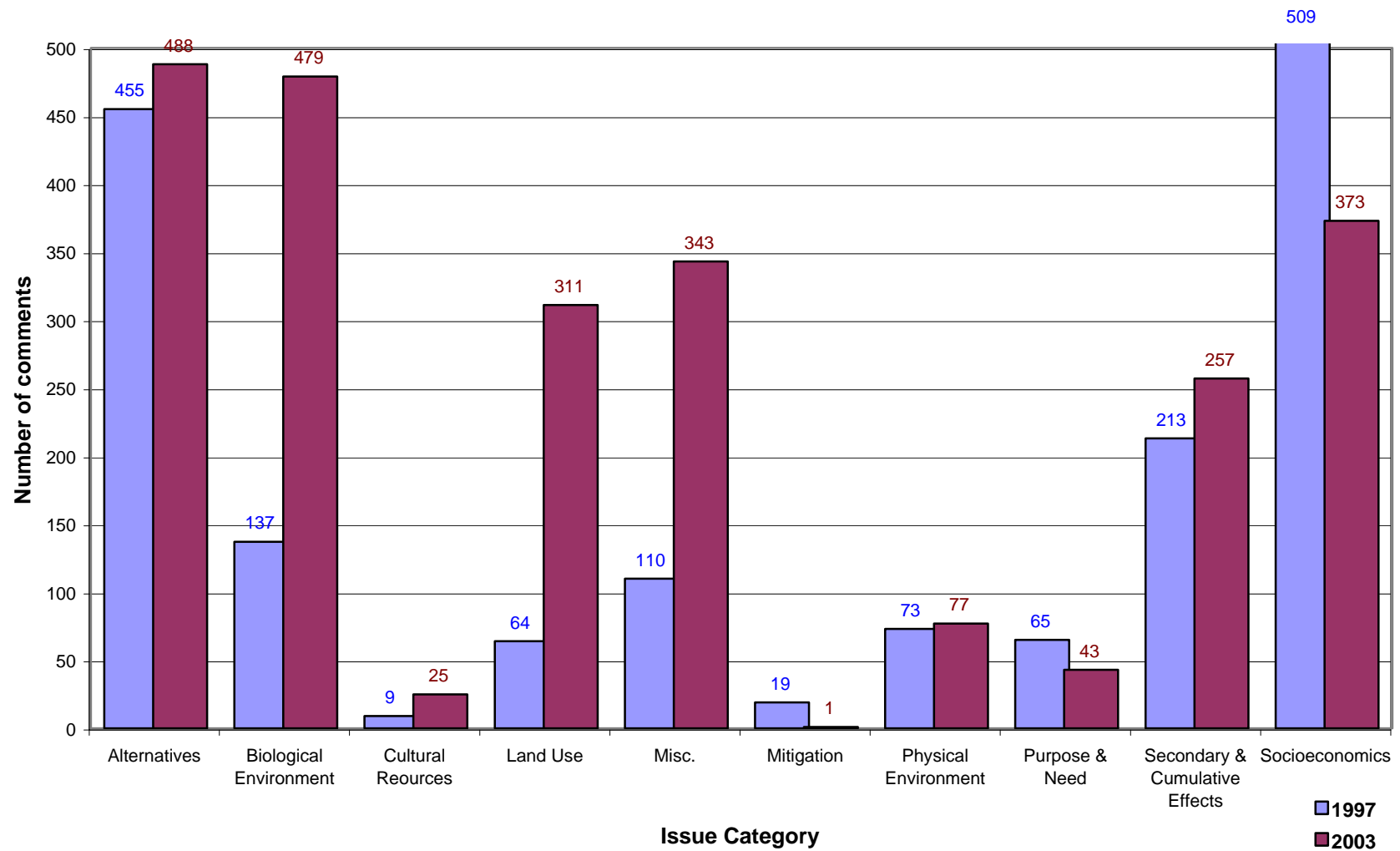


Figure 3-3. Distribution of 1997 and 2003 Substantive Comments Across Issue Categories.



4.0 Determining Response to Comments

A database report was generated listing all concern statements from 1997 and 2003 comments by general and/or sub-issue category. The concern statement database report is presented in Appendix A.

The concern statement database report was used by DOT&PF to plan 2003 field activities for gathering additional data, establish new analysis methods, and develop the SDEIS. A Response to Comments report will be written and appended to the SDEIS to document response to comments.

APPENDIX A
Database Reports for 1997 and 2003 Comments

Appendix A contains the following:

- Table of unused concern statement codes
- Database Report of 1997 Concern Statements
- Database Report of 2003 Concern Statements

UNUSED CONCERN STATEMENT CODES

The following concern statement code numbers do not have comments or concern statements associated with them. Concern statements previously associated with these codes were merged with other concern statements with similar topics.

ALT 08	SCC 09
ALT 20	SCC 20
ALT 38	SCC 22
HIS 02	SEC 11
HIS 06	SEC 51
HIS 07	SEC 56
LAN 09	SEC 57
LAN 10	SEC 58
LAN 11	SEC 59
LAN 13	SEC 60
MSC 28	TRA 04
MSC 29	VIS 01
MSC 34	VIS 02
MSC 35	VIS 07
MSC 36	VIS 09
PRP 10	WLD 18
PRP 11	

Juneau Access Improvements

1997 Concern Statements

Alternative Analysis

Statement Code	Summary
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ALT01	Consider the Southeast Plan in the alternative analysis.
ALT02	Complete the analysis of potential impacts of a ferry terminal at the Katzechin River.
ALT03	Address how ferry foot passengers will be accounted for under the road alternative.
ALT04	Provide more information on roadway design standards and the possibility and cost of future upgrades to higher design standards, such as widening the shoulders for emergency pull offs and bike lanes. The DEIS talks about a 32 foot roadbed when the federally funded road requirement is 36 feet.
ALT05	Alternative 2 (1997) analysis concerning traffic volumes is inconsistent with the winter traffic volume discussion for Haines and Skagway and the stormwater runoff potential effects statement.
ALT06	Select the preferred alternative during the DEIS period and submit it to agencies for their concurrence decision. Identification of the preferred alternative is required before NEPA process is final and 404 permitting initiated.
ALT07	Evaluate all alternatives for compliance with the Clean Water Act 404 (b) (1) guidelines and the impacts on air quality.
ALT09	Consider a hub-and-spoke ferry system, whereby mainline ferries Bellingham, Ketchikan and Juneau add dayboats from those stations to outlying communities at the same time each ferry day.
ALT10	The all-marine alternatives need to consider ferry terminal placement that will coincide with other projects: an expansion of the Auke Bay Terminal, and an evaluation of a deep water port at Cascade Point by Goldbelt, Inc.
ALT11	Alternatives 2, 4B, and 4D do not discuss improvements to the present road to access Berners Bay year-round. Discuss improvements impact on wetlands. Will existing culverts be upgraded to current fish passage standards?
ALT12	The marine alternatives should include provisions for, and identify cost of, terminals and improved customer service and reservations capabilities in addition to increased ferry trips, fast ferries and reliability.
ALT13	Air travel should be discussed as an alternative or as part of an alternative.
ALT14	The road analysis should provide more information on the logistics of running toll booths: location, costs, staffing, etc.
ALT16	Consider extending Thane road in Taku Inlet River to join the Canadian road between the mine at Tulsequa and Atlin.
ALT17	Consider making ferry system private enterprise for less expensive operation in addition to faster and lower priced people only ferries. End loading ferries would decrease loading time and smaller ferries to accommodate winter traffic would lower operation costs.
ALT24	Consider other air options, including reduced fares.
ALT27	Consider the Malaspina for runs up and down the canal.
ALT28	Connect a ferry to the Seward rail head.
ALT29	DOT must provide for alternative passage around the LUD II area should they select Alternative 2 as the access.
ALT30	Improve the Alaska Marine Highway and expand it with interconnecting shuttle ferries.
ALT31	Finish roads that almost connect now, such as 1/2 mile road on the south end of Wrangell. Add three to seven miles of road across the Cleveland Peninsula.
ALT32	The study should include a Taku River alternative.

Alternative Analysis

Statement Code Summary

ALT33	Look at high speed hydrofoil type car ferries used in Denmark.
ALT34	Consider using hydrogen or biomass or a combination of ethanol alcohol in ferries as an alternative fuel source.
ALT35	Amend the East Lynn Canal alternative to provide a better faster connection for Haines.
ALT37	Put in a shuttle terminal from Berners Bay or Bridget Cove to closest Haines access.
ALT39	Consider the weather impacts on the ferry planned across the narrows near Battery Point where high winds are common, especially during the winter. A small shuttle ferry would be extremely dangerous.
ALT40	The project should be considered in a 25+ year timeframe to address potential long-term changes in population and transportation habits.
ALT41	Reevaluate west access and discuss environmental and economic cost and benefits in comparison to east side access.
ALT42	Analyze the west access to Haines with a shuttle ferry from Berners Bay to St. James/William Henry Bay.
ALT43	Future plans should incorporate a bridge from Katzechin Flats to Battery Point.
ALT44	Consider a suspension bridge just north of Haines, across the Taiya Inlet to the east side of Lynn Canal.

Alternative Descriptions

Statement Code Summary

DSP01	Include a discussion of maintenance stations along the alignment of each road alternative.
DSP02	Describe what provisions will be made for visitor services and their funding, management, and maintenance (i.e., rest areas, restrooms, recreation areas, pull offs, bike lanes, etc.) for the road alternatives.
DSP03	Details of the proposed ferry terminal at Sawmill Creek need to be described (e.g., dredging).
DSP04	The alternatives should include a discussion on back up service during periods of ferry maintenance or breakdown and yearly open/availability rates.
DSP05	Identify other marine options that could meet the purpose and need (i.e., hydrofoil, hovercraft). Some may cost less money (i.e., use a ferry as a day boat in the summer).
DSP06	Details of the proposed ferry terminal at the Katzechin River are not fully discussed (i.e., possibilities of dredging, maintenance and management, position on an alluvial fan).
DSP07	The East Lynn Canal alternative should consider maintaining the existing ferry run between Haines and Skagway instead of building a new terminal at the Katzechin River.
DSP08	The shuttle ferry terminal in Haines should be in a more convenient location (e.g., downtown Haines).
DSP09	The description of time it would take to travel between destinations is inconsistent between road (one-way trip) and marine (round trip); only one-way should be used throughout the document.
DSP10	Options for the road terminus into Skagway should be expanded and potentially revised.
DSP11	A plan for maintaining and even improving ferry service during the construction period of the East Lynn Canal Highway should be included for the road alternative.
DSP13	Consider limited or no access from the highway between Skagway and Juneau.

Avalanche

Statement Code Summary

AVA01	The final document should provide complete data on avalanche sites.
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Avalanche

Statement Code	Summary
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| AVA02 | Avalanche mitigation, including the potential impacts of weather on mitigation (e.g., low visibility restricting the use of helicopter operations) and ensuring public safety, should be discussed. Release the avalanche report. Include information on mitigation efforts used in other states. |
| AVA04 | Discuss what will be done with the additional debris generated from avalanche mitigation. |

Bald Eagles

Statement Code	Summary
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| EAG01 | Additional surveys are needed to identify new nests, nests missed during earlier surveys, and abandoned bald eagle nests. These nests should be avoided by the road by at least 100 meters and 800 meters for blasting during the nesting season. |
| EAG02 | The abundance of bald eagles in the road alternative project area needs to be quantified. |
| EAG03 | Provide more information on mitigation measures proposed to minimize impacts to bald eagles. Refinements to the road alternative alignment may be necessary to avoid bald eagle nests and Chilkoot Eagle Preserve. |
| EAG04 | Road alignments upslope from nesting trees could place the road at eye level to the nest. The road alignment should be downslope from nesting trees on steep shoreline terrain, and a screen of vegetation should be left intact between the road and nests. |
| EAG05 | Windthrow damage deserves far more consideration in the Technical Report. Blowdown will be extensive along a large portion of the road corridor for decades. |

Capacity

Statement Code	Summary
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| CAP01 | The DEIS needs to reconcile the conflict between the estimate that ferries run at 70% capacity during the summer months and the statement that ferries cannot meet demand. |
| CAP02 | The marine alternative analysis should demonstrate whether adding a day boat in the corridor would accommodate demand. |
| CAP03 | Correct the projections presented in the DEIS which are in conflict with the marine engineers project capacity of 850 vehicles per day for Alternative 4. |
| CAP05 | The DEIS appears to underestimate the future demand for the marine alternatives, and more ferries may be required to accommodate demand. |

Construction

Statement Code	Summary
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| CST01 | Outline the need for material sites, quantity of material required, and potential locations of material sites. |
| CST02 | Deepwater disposal sites need to be identified and potential impacts should be evaluated. |
| CST03 | The feasibility of providing excess material to local communities should be investigated. |
| CST04 | Construction camp impacts should be evaluated. |
| CST05 | If helicopters are to be used for construction activities their impacts to wildlife needs to be evaluated. |
| CST06 | Blasting plans should be developed to protect sensitive terrestrial and aquatic species. |
| CST07 | A description and assessment of the types, cost, and maintenance of bridges and avalanche snow sheds that could be built as part of the road alternative should be included in the DEIS. |
| CST08 | A timeline for anticipated construction activities for the road alternative should be presented, including times when construction would be off-limits due to fish/bird migration, winter, etc. |

Construction

Statement Code	Summary
CST09	Provide a comparison of energy usage required for construction activities alone for each alternative (similar to Table 5-5).
CST10	Calculate the risk that correlates with the number and severity of curves as well as the width of the proposed road. Also calculate safety per passenger mile for each alternative.

Fish

Statement Code	Summary
FSH01	The quality of the stream surveys is questionable.
FSH02	Discuss impacts to riparian floodplains critical to fish in the project area.
FSH03	Discuss potential project effects at the intertidal interface between streams and the marine environment.
FSH04	The anadromous stream listing needs to be updated due to the Otter Creek Hydro Project.
FSH05	The presence and impacts to steelhead, Pacific herring and cutthroat trout in streams is not mentioned in the analysis.
FSH06	The DEIS should discuss upgrading the culverts on the existing road to provide improved fish passage.
FSH07	A survey of beaver activity as it relates to salmon habitat in the project area should be conducted
FSH08	Discuss the criteria used to design bridges that would not affect eulachon migration. Consider the new information on eulachon spawning runs and habitat, and their role as a critical food source for much of the wildlife in Lynn Canal and Berners Bay.
FSH09	Discuss measures used to minimize adverse effects to anadromous fish streams that will be crossed by the highway.

Geology

Statement Code	Summary
GEO01	Additional rationale should be presented to justify the statement on page 5-15 (1997 DEIS) that Alternatives 2 and 4 would result in negligible impacts to soils and geology.
GEO02	Feasibility of building a road on land that has been described as unsuitable for development due to its poor soil limitation rating should be further investigated in the road alternative analysis.
GEO03	It is unclear if a geologic survey along the proposed highway alignment has already been performed to support the statement that "most of the rock is expected to be of adequate strength and character to allow the large steep cuts necessary if Alternative 2 is selected."

Historic/Archaeological/Cultural Resources

Statement Code	Summary
HIS01	The required consultation with Native groups needs to be conducted.
HIS03	The DEIS needs to provide documentation to support the conclusion that the Ship Registry Cliffside Paintings will not be adversely effected by a road alternative.
HIS04	The document needs to clarify the extent of the areas where field surveys were conducted (e.g., maps) and provide a table that shows survey site identification number and status. Survey the entire project area and provide an affected cultural resources and karst/caves inventory.
HIS08	Historical and Archaeological Resources section needs to address direct, indirect, and cumulative effects, as well as any other applicable laws or regulations.
HIS09	The Lower Dewey Lake bench and KLGO as historic places and should be considered in the evaluation of alternatives.

Hydrology

Statement Code	Summary
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| HYD01 | The potential for a roadway to act as a barrier to shallow groundwater and slope runoff, and the potential for drainage systems to direct sediment laden slope run off to wetlands and streams have not been adequately addressed in the DEIS. Specify factors and design criteria considered that would achieve the objective outlined on page 5-17 (1997 DEIS). |
| HYD02 | A hydrologic study is needed to determine the potential effects of structures at Berners Bay, the Katzeihin River, and other flood plains on channel morphology, and flood plain dynamics. |

Land Use

Statement Code	Summary
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|-------|--|
| LAN01 | Land use designations should be updated using the latest Tongass Land Management Plan. This may require revisions to Figure 4-1 and P5-1. |
| LAN02 | Alternative 2 (1997 DEIS) is a non-essential transportation corridor and would not be in compliance with LUD II guidelines. These areas are protected by roadless designation for exceptional wilderness and wildlife habitat. |
| LAN03 | Use of LUD II land in Berners Bay is a 4(f) use, and feasible options have been declared, 1 and 4a. |
| LAN04 | The project will not affect any Section 4 (f) resources. |
| LAN05 | The Native Allotment application on file in the Berners Bay area needs to be incorporated into the analysis. |
| LAN06 | The discussion of how existing recreational and subsistence opportunities could change under a road based alternative needs to be expanded (especially Dewey Lake Trail System and areas that are dependent on wilderness). |
| LAN07 | There is a potential conflict between the planned Sherman Creek Wayside boat launch and the Kensington Mine marine terminal. |
| LAN08 | Relocation of the Berners Bay cabin and construction of a new day use area should be part of the project elements for the road alternative. |
| LAN12 | A management strategy should be developed for Berners Bay to minimize potential impacts. |
| LAN14 | The most current CBJ Comprehensive Plan should be discussed in the DEIS instead of the outdated 1988 Plan. |

Landslides

Statement Code	Summary
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| LNS01 | The document does not adequately address landslide dangers in the corridor (i.e., frequency, mitigation, and cleanup cost). |
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Miscellaneous

Statement Code	Summary
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| MSC01 | The document should contain a section called "Decisions To Be Made" that outlines the decisions that will be made by all agencies as a result of the document. |
| MSC02 | Lower the estimated average driving speed presented for route between Juneau and Skagway to account for slow RV traffic, lack of passing lanes and winter conditions. |
| MSC03 | Include probability of earthquake damage and cost of repairs. |
| MSC04 | It should be clarified on page 5-39 (1997 DEIS) that the formal project review for purposes of the 404 permit is initiated in response to the Corps public notice, not the Corps permit. |
| MSC05 | A decision based on quality of life is questionable since quality of life is a perception and perceptions change (reference page S-1, paragraph 4, 1997 DEIS). The DEIS seems to assume that "quality of life" equates to unrestricted driving. |

Miscellaneous

Statement Code	Summary
MSC08	Section 5.4.10 (1997 DEIS)--it is not clear whether this discussion refers to economic or environmental impacts or both. Thorough, clear discussion of natural resource productivity relative to each alternative should be included.
MSC09	Many unsubstantiated or undocumented statements are made in the DEIS. Conclusions and calculations need to be documented with a reference or explicitly outlined. Energy use and efficient use of resources is one of these statements.
MSC10	Discussion of ferry options is limited (should include an analysis of more vessel types) and are inconsistent in referring to the INCAT 84 meter vessel and the INCAT 78 meter vessel (pages 3-15, 3-16, and Figure 3-11).
MSC11	Comments acknowledged.
MSC12	Table 5 of the User Benefit Analysis does not include the Capital Cost of \$95 million that is included in Table 3-2.
MSC13	Assess the efficiency and environmental impacts of the ferry terminal to Berners Bay (Alternatives 4B and 4D).
MSC14	The DEIS should include a comparison of fuel consumption and pollution between the alternatives.
MSC15	Discuss the safety of taking the ferry vs. driving.
MSC17	Consider the quality of experience for the resident or visitor separately (i.e., to not drive, to take the ferry). And safety in the cost/benefit analysis.
MSC20	Request improvements in document organization.
MSC23	Put the alternatives up for vote in the southeast communities.
MSC24	Clarify whether or not there is an option to have both a road and a ferry system, and what happens to the AMHS if a road alternative is approved.
MSC27	Consider the litigation of having a road ranked 369.5 on the avalanche hazard index. In addition to the environmental litigation.
MSC30	The document should address the values (scenic, wildlife, and economic) of having a roadless area.
MSC31	The public process should be availed for all citizens to participate (i.e., hearings).
MSC32	Photos on S13 and S16 might have the captions switched.
MSC33	Appendix E fails to contain cost of travel estimates for Alternative 2.
MSC37	Accommodate for travelers that kayak to the ferry terminals or bring bikes.
MSC38	Reference the Juneau Economic Development Committee spring 1997 profile document which notes that Juneau's population has increased at a significantly lower percentage than the 3 percent per year traffic volume increase on Egan Drive over the last seven years.
MSC39	The proposed road violates the concept of the Shakwak Project. It would add distance when the Shakwak is supposed to make access shorter.
MSC40	Consider the benefit of access to health care facilities in Juneau.

Mitigation

Statement Code	Summary
MIT01	An inventory of alternative mitigation options should be developed that would be sufficient to compensate for project impacts.
MIT02	Wildlife mitigation measures should be further refined. The use of monitoring as a mitigation measure should be evaluated further.
MIT03	Discuss mitigation proposed for moose impacts in Berners Bay.

Mitigation

Statement Code	Summary
MIT04	Moose browse enhancement should be further discussed as a mitigation measure.
MIT06	The DEIS should clearly state that cooperative studies cited to mitigate impacts have been proposed unilaterally.
MIT07	More background information and backup data are needed to support the use of underpasses as a mitigation measure for wildlife movement, particularly for large mammals. Include cost estimates for the underpasses.

Noise

Statement Code	Summary
NOI01	The DEIS should expand the noise analysis for adding a new highway through a completely undeveloped area, include the quantity increase from present levels.
NOI02	Correct the section in the DEIS which states that downtown Skagway currently experiences helicopters, trains, small planes, cruise ships and trail activities and that noise increases from the road would be imperceptible.

Operations

Statement Code	Summary
OPR01	The DEIS should discuss how emergency response and public safety needs would be handled along a road corridor and in the impacted communities (e.g., medical transport, accident response, towing). Include steps that will be taken to ensure people will not be stranded between two, or more, avalanches.
OPR02	The DEIS should discuss how the ADOT would maintain reasonable highway service during winter months when the road is closed due to avalanches and inclement weather. Include a projection of how many days the closures may take place and potential costs.
OPR03	The potential for shuttle ferry operation to Haines to be out of service for extended periods of time due to high winds should be taken into account. This time will increase with a ferry from Katzehein. Discuss the projected reliability, time of year of closures (winter closures affect less people), and cost of more seaworthy vessels.
OPR04	The issue of hazardous material transport on a highway and the potential for spills and their impacts needs to be addressed in the DEIS.
OPR05	Discuss the strategy to maintain the low growing plant buffer zone along the highway. The use of native plant materials and hydroseeding for revegetating slopes, to keep out invasive species, is recommended.
OPR06	The document should discuss how the Katzehein terminal maintenance and operation would be accomplished with projected costs included.

Purpose and Need

Statement Code	Summary
PRP01	The reduced costs to users and the State of Alaska statements should be removed from the project purpose and need statement.
PRP02	The purpose and need section needs substantial clarification and quantifiable feasibility discussion.
PRP03	It seems that Alternative 2 (1997 DEIS), with anticipated delays due to weather, winter avalanche closures, and/or lack of funding for equipment and maintenance, would not meet most of the purpose and need criteria.
PRP07	The purpose and need for a new road is not clear. Clarify the roads users and beneficiaries, tourists, summer resident or year round resident, and actual changes in travel between Fairbanks and Anchorage (i.e., people, time, reason).

Purpose and Need

Statement Code Summary

- PRP08 Amend the 1997 DEIS to remove the inherent bias, especially toward the eastern road alternative, which the EPA believed permeated the purpose and need statement and rest of the document. Research and report on each alternative equally (include mailings that represent all benefits and costs of every alternative).
- PRP09 Include most environmentally preferable, improvement to quality of life, safe and reliable transportation and public transportation to the purpose and need.
- PRP12 Answer all of the EPA's concerns and satisfy comments and concerns of resource agencies.

Secondary and Cumulative Effects

Statement Code Summary

- SCC01 The Dewey Lakes system, Otter Creek and Lace River as well as future hydroelectric projects and the cost of producing energy need to be addressed in the analyses.
- SCC02 The analyses should address the potential for future mining operations in addition to the Kensington and Jualin mines.
- SCC03 The DEIS needs to better evaluate impacts to Pacific herring and eulachon in Berners Bay and Lynn Canal.
- SCC04 The potential cumulative effects on wildlife, including threatened and endangered species, and the environment have not been adequately evaluated.
- SCC05 The secondary and cumulative impacts resulting from development and greater access should be considered in the evaluation (i.e., decreased wilderness). Discuss what types of development will be allowed.
- SCC06 Economic losses from declines in hunting, fishing, and other wildlife related activities should be included in the analyses.
- SCC07 Induced growth and increased vehicle use and their consequences on Juneau, Haines, and Skagway should be evaluated (social and political costs, unique qualities as well as air quality).
- SCC08 Potential secondary development at Sawmill Creek, Slate Creek, and the Katzeihin River should be analyzed.
- SCC10 The indirect effects of increased noise from tourism activities associated with the road alternative needs to be addressed.
- SCC11 The potential for increased hunting and/or fishing with the road alternative and its impacts needs to be addressed.
- SCC12 The impacts of the proposed breakwater at the Katzeihin River ferry terminal need to be discussed.
- SCC13 Secondary effects on timber harvesting, mineral extraction, and road construction (allowed in TLMP) should be evaluated.
- SCC14 Cumulative effects for Berners Bay need to be further developed (e.g., NEPA compliance states a lead organization must write a cumulative EIS, which would apply to Kensington & Jualin mines and Goldbelt's Cascade Point development and Lace River hydro project. Also study cumulative effects of: log transfer facilities, increased hunting & fishing, harassment of endangered species, expansion of tourism and recreation, plans to control access to cultural sites in the area, etc.).
- SCC15 Cumulative impacts to natural resources should be discussed in a single section and should include a thorough discussion of reasonably foreseeable future actions.
- SCC16 The possibility of increased homelessness, crime and pollution resulting from greater access in the impacted communities and along the roadway should be addressed in the analysis.
- SCC17 Impacts of increased recreational fishing and decreased/impacted fisheries habitat on the commercial fishing industry as a result of increased access under the road alternative need to be discussed.
- SCC18 Impacts from off-road vehicle use in sensitive areas as a result of greater access should be discussed.

Secondary and Cumulative Effects

Statement Code Summary

- SCC19 Discuss impacts to small tourism operators (i.e., guides).
- SCC23 The road alternative analysis should consider effects on the majority of the communities in the southeast (i.e., Pelican) and not just Haines, Skagway, and Juneau.

SocioEconomics

Statement Code Summary

- SEC01 The DEIS should reflect the latest population growth rate.
- SEC02 The DEIS needs to discuss tourism statistics and the effects of a road on tourism.
- SEC03 The DEIS needs to further analyze the economic impacts of alternatives on the communities of Juneau, Haines and Skagway (e.g., net loss/gain in jobs, mass transit system, sectors that will gain/lose, and year round barge/air/freight services).
- SEC04 More information is needed concerning potential infrastructure needs in affected communities, Juneau in particular, due to increased numbers of visitors.
- SEC05 The document should contain a detailed breakdown of information on construction, maintenance, and operation costs to enable verification and accuracy of costs to appropriate parties.
- SEC06 Clarify if the costs associated with improving the existing highway, to the end of Glacier Highway, are included in the project costs.
- SEC07 Mitigation costs should be included in the total project cost.
- SEC08 Maintenance costs should account for periodic major resurfacing, bridge repairs, etc., over the life of the project.
- SEC09 Clarify why the DEIS costs figures differ so much from the original reconnaissance study and other stages of the NEPA process.
- SEC10 The economic impacts to the AMHS due to the loss of revenue along Lynn Canal needs to be included in the analysis.
- SEC12 The sample size of the household survey is smaller than required for statistical reliability, and neither corrections to nor a discussion of the biases inherent in the survey were made.
- SEC13 The household survey questions were biased towards the road alternative. It should say, "Do you need a road?"
- SEC14 Benefits to diverted, induced, and total users are overstated. Show a table illustrating the benefits of each option.
- SEC15 The numbers in the User Benefit Analysis, page 7, do not agree with the numbers for the Juneau-Haines segment on DEIS page 2 to 3, Table 2-01.
- SEC16 The appropriateness of the discount rate and the use of a single discount rate are questioned.
- SEC17 The economic model is not appropriate for comparing different transportation modes such as ferries, roads and an air option. The economic analysis needs to be redone to equally compare each alternative and accordingly adjust the cost/benefit analysis.
- SEC18 Sensitivity analysis should be applied to the user benefit study.
- SEC19 The assumption that all walk-on ferry travelers count as being in vehicles inflates the cost for ferry travel.
- SEC20 The use of a single per capita income for all travelers regardless of employment, age, etc., is questionable.
- SEC21 The use of a single time value for all travelers is not appropriate.
- SEC22 Children should be excluded from the total number of travelers.

SocioEconomics

Statement Code Summary

SEC23	The DEIS does not adequately address the costs associated with avalanche mitigation and winter road maintenance for both the proposed highway and the existing highway. The costs should be reflected in the user benefit analysis. Include a percent confidence for the projected costs.
SEC24	The project should be built in phases so that it does not take more than its share of funds available for construction.
SEC25	The availability of money under the proposed funding source is questionable, as is the responsibility of taking it (i.e., Shakwak, bonds, private sources, and supplemental federal allocations).
SEC26	It is unclear if the costs for construction, equipment, operation and maintenance, staff and cumulative economic and social impacts (AS 44.45.020(a)(3)) were included for each road alternative economic analysis. Separate state and traveler cost.
SEC27	It is unclear if the \$100 million labor costs associated with the construction cost for Alternative 2 (1997) was considered in Table 3-2 and how that cost estimate would compare to labor costs associated with the marine highway alternative.
SEC28	A discussion of increased fares for passenger, vehicle and peak season surcharge under the marine highway alternative should be evaluated so that it could be self supporting.
SEC29	It is unclear if the economic analysis included the costs to implement potential mitigation projects.
SEC30	The proposed toll has not been included as a user cost to travel the highway.
SEC31	Since the East Lynn Canal highway would be different than other highways in Alaska the state subsidy per mile of \$7.00 should be increased.
SEC32	The annual maintenance costs for the highway alternative is different on DEIS page 3-15, Appendix C page 1, and on DEIS page 2-27.
SEC33	The conclusions of demographics needs to be revised since the AJ Mine will not be opening.
SEC34	The DEIS is outdated with regards to public opinion of the project and needs to be updated.
SEC35	The DEIS should use an Alaska income value rather than a U.S. Value, making its wage-bill value more relevant.
SEC36	The user cost of \$20 for using the road alternative (Table 3-2, 1997 DEIS) should include costs associated with owning and maintaining a vehicle (e.g., cost of car, car maintenance, insurance, fuel, oil, etc.).
SEC37	The AASHTO user benefit model was never intended to be applied to a new road in an undeveloped area, but rather to evaluate options within an existing road system. Thus, many costs such as degradation and loss of option were not accounted for.
SEC38	Ferry costs are incorrect in the DEIS; the costs are actually lower than represented in the DEIS.
SEC39	The "frequency delay time" included in the marine alternatives, where a person's time waiting for the next ferry is given monetary value, is questionable.
SEC40	A higher road toll should be considered for heavy mining equipment.
SEC41	Discuss the road alternative's impact on funding, operations and maintenance of roads and facilities locally and in other parts of the state.
SEC42	The DEIS does not account for the potential of cost overruns for construction of the East Lynn Canal highway. Where will additional needed funding come from?
SEC43	It is unclear how additional police patrol and emergency services along the road, and in the impacted communities, will be funded, or how much additional force is actually needed.
SEC44	It is unclear how the costs for joint development recreational opportunities (e.g., campgrounds, picnic areas) were accounted for in the total costs for alternative 2.
SEC45	The user benefit of the positive experience of taking the ferry is excluded from the user-benefit analysis.

SocioEconomics

Statement Code Summary

- SEC46 The engineer's cost estimate appears to be for a highway length of 91 km, but the DEIS discusses a required highway length of 105 km (or possibly 110 km). Cost underestimates should be accounted for. Distances should be expressed in mile.
- SEC47 The DEIS should include information on the costs of goods and services and how a road would impact those costs. (Barging will still be more economical than trucking.)
- SEC48 Cost analysis of the alternatives should be done independently of Department of Transportation.
- SEC52 The cost of maintaining ferry docks in Juneau, Skagway and Haines, for emergency use, should be included in each of the road alternatives.
- SEC61 The road will allow families to travel more frequently. The average income citizen cannot now, or in the future be able to make more than one trip/year out of Juneau with his family due to the high cost of air and ferry fares.
- SEC62 Consider the costs associated with ferry service due to labor strikes and subsequent down times.

Steller Sea Lions

Statement Code Summary

- SSL01 Three Steller sea lion haulout areas are within the proposed East Lynn Canal corridor. What measures are proposed to minimize impacts to the haulouts?
- SSL02 Steller sea lions have been observed at Gran Point during most of the year. More information is needed on haulout use throughout the year.
- SSL03 The number of Steller sea lions observed at Gran Point has exceeded 1,100. There is reason to believe that this area may be a rookery since mating behavior has been observed as well as young pups spread along a half mile of shoreline.
- SSL04 The Final EIS should indicate if the NMFS concurs with the proposed mitigation measures for Steller sea lions.

Traffic

Statement Code Summary

- TRA01 The DEIS overestimates traffic projections in the DEIS and should reflect actual traffic conditions.
- TRA02 The traffic analysis should include estimates of tourist traffic, especially RV traffic, in Haines, Skagway, and Juneau under different alternatives.
- TRA03 The traffic analysis needs to clarify or account for the discrepancy in estimated traffic volumes on the Klondike versus stated actual counts at the border.
- TRA05 Explain how the speculative mining, logging, and commercial traffic projections were derived.
- TRA06 The potential for congestion on a highway during summer months as a result of discontinuing the mainline ferry should be addressed. Projected percentages of RV, heavy mining equipment, sightseers, etc. and their effect on the flow of traffic because of no pull offs, sharp curves and narrow lanes.
- TRA07 Explain how tour bus traffic estimates were derived.
- TRA08 Explain how ferry unaccompanied vehicle estimates were derived.
- TRA09 A discussion of the impacts of mining traffic should be included.
- TRA10 The East Lynn Canal Highway classification of "Industrial Use" should be extended to the Skagway AIDEA-funded ore terminal so that Canadian shipments can deliver here.
- TRA11 Local traffic usage estimates are overstated, particularly because the survey did not mention the possibility of a toll when polling Juneau, Skagway, and Haines residents.

Traffic

Statement Code Summary

- TRA12 Discuss the effects of losing the mass transit system on traffic, villages, tourists and people without cars (e.g., cost of bus travel, shuttle ferries, time needs and requirements to travel a road, and moving the ferry terminal from Auke Bay to Berners Bay).
- TRA15 Revise the methodology developed for analyzing the bus systems so that it is applicable.

Visual

Statement Code Summary

- VIS03 The document should provide a clear description or graphic depictions of the proposed project that clearly represents the visual impacts.
- VIS04 The 1997 DEIS does not adequately present adverse visual impacts described in the visual technical report.
- VIS05 The visual impacts from bridges in Berners Bay and the Katzeihin areas needs to be addressed in the analysis.
- VIS06 The visual impact of taking advantage of ridgelines and rock outcroppings for highway construction needs to be analyzed in the document. Discuss the effect the view of the road could have on cruise ship traffic.
- VIS07 Unused
- VIS09
- VIS10 Page 5-5 of 1997 DEIS states that alternative 2 "would provide significant and beneficial viewing opportunities," which is in conflict with other statements within the document that wildlife resources will have decreased habitat and sustainable yields in the road corridor.

Water Quality

Statement Code Summary

- WTR01 Potential water quality impacts resulting from road maintenance activities, fuel storage, Kensington Mine Maintenance Facility, or construction staging should be part of the analysis for all alternatives.
- WTR02 If water withdrawal will be associated with the development of construction camps or ferry terminals a discussion of the impacts to base flow should be included for all applicable alternatives.
- WTR03 The potential for water quality impacts due to an increase in recreational use of Berners Bay and other areas needs to be addressed in the analysis.
- WTR04 The effects of ground disturbing activities on stream water quality need to be addressed.
- WTR05 The potential impacts from deep water disposal of material and disposal of segregated woody debris needs to be addressed.

Wetlands

Statement Code Summary

- WET01 It is recommended that hydrogeomorphic functions be used to assess slope (highway placement effects on subsurface/surface flow and water storage) and riverine (channel and water storage dynamics and energy dissipation) wetlands.
- WET02 The DEIS pays little attention to individual wetlands and needs to provide a better assessment of wetland complexes and impacts to individual wetlands.
- WET03 The potential for on site in kind replacement of wetlands should be assessed.
- WET04 The need to relocate the road across a wetland complex to avoid the Wild and Scenic portion of the Katzeihin River is questionable.

Wetlands

Statement Code	Summary
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WET05	Project wetland mapping must be done in accordance with the 1987 Corps Wetland Delineation Manual and under the February 7, 1990 memorandum of agreement between the EPA and the Department of the Army (mitigation MOA).
WET06	The location/limits of wetland complex B-4 is not identified and an associated wetland functional assessment was not included in the Wetlands Technical Report.
WET07	Since the West Lynn Canal was not carried forward as a project alternative the study area boundary for the wetland analysis should be revised to include only the East Lynn Canal corridor and the marine highway options.
WET08	The DEIS does not identify the total acreage of impacts to wetlands and special aquatic sites within the Berners Bay area.
WET09	Wetland maps in the Wetlands Technical Report should all be at the same scale for easier comparison. They should also include additional information, including linear length of road crossings, acreage of affected wetlands, and wetlands functions.
WET10	The wetlands analysis only used 7 of 12 wetlands functions to value each complex. All 12 of the functions should be applied to the value ranking system.

Wild & Scenic Rivers

Statement Code	Summary
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RIV01	Would the development of the East Lynn Canal corridor preclude future consideration of the Lace and/or Antler Rivers as Wild & Scenic?
RIV02	What are the effects of the East Lynn Canal Route on the US Forest Service's ability to manage the Gilk and Katzechin Rivers as Wild & Scenic, and how would negative impacts be mitigated?

Wildlife

Statement Code	Summary
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WLD01	A biological evaluation must be conducted to address potential impacts to US Forest Service Region10 sensitive species.
WLD02	The choice of indicator species used in the study is questionable. The FEIS should include additional species comparable to the 13 species used by the Forest Service in the TLMP.
WLD03	The last paragraph on page 5-22 of the DEIS gives the impression that all habitat is equal. The amount of habitat impacted is important. The analysis should include a discussion of where the habitat is located and what uses the habitat supports.
WLD04	Wildlife migration corridors should be identified so that potential impacts can be mitigated.
WLD05	The potential need for increased wildlife management and the costs involved needs further discussion for the road alternative.
WLD06	Moving the road alignment to EIS-B in Berners Bay to avoid wetlands could exacerbate moose impacts. These impacts need to be better evaluated.
WLD07	Estimate the number of moose hit by cars each year, because of the public safety issue as well as a moose impact.
WLD08	The FEIS should provide a species list of birds, mammals, fish, amphibians, etc., in the project area.
WLD09	The document should provide more information/discussion on goshawks, and the goshawk nests identified in the 1997 DEIS need to be identified on a map.
WLD10	The document does not evaluate potential impacts to Sitka black-tailed deer (i.e., winter and summer ranges, abundance, etc.).
WLD11	The potential effects of road operations, construction and avalanche mitigation on mountain goats and other wildlife are not discussed in the document.
WLD12	The DEIS needs to analyze impacts to goats and bears between Echo Cove and Sawmill Creek.

Wildlife**Statement Code Summary**

WLD13	The document does not provide information or potential effects to the Alexander Archipelago wolf (i.e., denning site locations, winter and summer distribution, etc.).
WLD14	The document should provide information on migratory bird use of the project area (i.e., species, periods of use, potential impacts, etc)
WLD15	Impacts to trumpeter swans in Berners Bay need to be evaluated (i.e., location of nesting, brooding, and rearing areas).
WLD16	Include tables or figures that compare, all species impacts, including threatened and endangered species, and habitat impacts, fragmentation and reductions (marine and land) for each of the wildlife species/habitat types between every project alternative.
WLD17	The habitat capability models cannot provide confident quantification of animal number reductions, as presented in the DEIS. How well do habitat capability models account for human-caused mortalities (poaching, collisions, hunting, etc.)?
WLD19	Assess impacts to species in Berners Bay and other areas because of increased recreation use, hunting, fishing, wildlife and marine viewing and bird watching.

Juneau Access Improvements 2003 Concern Statements

Alternative Analysis

Statement Code	Summary
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ALT04	Provide more information on roadway design standards and the possibility and cost of future upgrades to higher design standards, such as widening the shoulders for emergency pull offs and bike lanes. The DEIS talks about a 32 foot roadbed when the federally funded road requirement is 36 feet.
ALT07	Evaluate all alternatives for compliance with the Clean Water Act 404 (b) (1) guidelines and the impacts on air quality.
ALT12	The marine alternatives should include provisions for, and identify cost of, terminals and improved customer service and reservations capabilities in addition to increased ferry trips, fast ferries and reliability.
ALT13	Air travel should be discussed as an alternative or as part of an alternative.
ALT15	A train should be considered and evaluated as an alternative, and evaluated as such.
ALT16	Consider extending Thane road in Taku Inlet River to join the Canadian road between the mine at Tulsequa and Atlin.
ALT17	Consider making ferry system private enterprise for less expensive operation in addition to faster and lower priced people only ferries. End loading ferries would decrease loading time and smaller ferries to accommodate winter traffic would lower operation costs.
ALT18	Tunneling a portion or all of the road may be an option for safer and more reliable travel.
ALT19	Basing fast ferries out of Juneau instead of Sitka is a good option in addition to the no action alternative.
ALT21	Look at a road option from Berners Bay across the Lynn Canal (a bridge across Endicott River) and then a causeway, or similar, to Haines, and a short road up Lutak to tie in Skagway.
ALT22	Consider an alternative with a west side route and a road link to Skagway.
ALT23	An option of a one lane highway with pilot cars and scheduled departures should be considered.
ALT24	Consider other air options, including reduced fares.
ALT25	Improve internet access and subsidize phone service for anyone to access state government with video conferencing.
ALT26	Consider Marine Mammal Viewing Guidelines for all marine alternatives.
ALT32	The study should include a Taku River alternative.

Alternative Descriptions

Statement Code	Summary
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DSP02	Describe what provisions will be made for visitor services and their funding, management, and maintenance (i.e., rest areas, restrooms, recreation areas, pull offs, bike lanes, etc.) for the road alternatives.
DSP04	The alternatives should include a discussion on back up service during periods of ferry maintenance or breakdown and yearly open/availability rates.
DSP06	Details of the proposed ferry terminal at the Katzeihin River are not fully discussed (i.e., possibilities of dredging, maintenance and management, position on an alluvial fan).
DSP07	The East Lynn Canal alternative should consider maintaining the existing ferry run between Haines and Skagway instead of building a new terminal at the Katzeihin River.
DSP10	Options for the road terminus into Skagway should be expanded and potentially revised.
DSP12	Include a hard road link between Haines and Skagway.

Alternative Descriptions

Statement Code Summary

- DSP13 Consider limited or no access from the highway between Skagway and Juneau.
- DSP14 Calculate a realistic layover time for ferries, the 22 minutes previously stated is not accurate.

Avalanche

Statement Code Summary

- AVA02 Avalanche mitigation, including the potential impacts of weather on mitigation (e.g., low visibility restricting the use of helicopter operations) and ensuring public safety, should be discussed. Release the avalanche report. Include information on mitigation efforts used in other states.
- AVA03 Compare Juneau Access with the Klondike, Seward Highway, Red Mountain Pass (CO) and Teton Pass (WY) for safety and winter operation time and costs.

Bald Eagles

Statement Code Summary

- EAG01 Additional surveys are needed to identify new nests, nests missed during earlier surveys, and abandoned bald eagle nests. These nests should be avoided by the road by at least 100 meters and 800 meters for blasting during the nesting season.
- EAG03 Provide more information on mitigation measures proposed to minimize impacts to bald eagles. Refinements to the road alternative alignment may be necessary to avoid bald eagle nests and Chilkoot Eagle Preserve.
- EAG05 Windthrow damage deserves far more consideration in the Technical Report. Blowdown will be extensive along a large portion of the road corridor for decades.

Construction

Statement Code Summary

- CST02 Deepwater disposal sites need to be identified and potential impacts should be evaluated.
- CST07 A description and assessment of the types, cost, and maintenance of bridges and avalanche snow sheds that could be built as part of the road alternative should be included in the DEIS.
- CST10 Calculate the risk that correlates with the number and severity of curves as well as the width of the proposed road. Also calculate safety per passenger mile for each alternative.

Fish

Statement Code Summary

- FSH03 Discuss potential project effects at the intertidal interface between streams and the marine environment.
- FSH05 The presence and impacts to steelhead, Pacific herring and cutthroat trout in streams is not mentioned in the analysis.
- FSH08 Discuss the criteria used to design bridges that would not affect eulachon migration. Consider the new information on eulachon spawning runs and habitat, and their role as a critical food source for much of the wildlife in Lynn Canal and Berners Bay.
- FSH09 Discuss measures used to minimize adverse effects to anadromous fish streams that will be crossed by the highway.
- FSH10 Discuss impacts on salmon runs and fisheries of Berners Bay.
- FSH11 Include a section on Essential Fish Habitat.

Geology

Statement Code	Summary
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GEO03	It is unclear if a geologic survey along the proposed highway alignment has already been performed to support the statement that "most of the rock is expected to be of adequate strength and character to allow the large steep cuts necessary if Alternative 2 is selected."
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Historic/Archaeological/Cultural Resources

Statement Code	Summary
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HIS01	The required consultation with Native groups needs to be conducted.
HIS04	The document needs to clarify the extent of the areas where field surveys were conducted (e.g., maps) and provide a table that shows survey site identification number and status. Survey the entire project area and provide an affected cultural resources and karst/caves inventory.
HIS05	All of the cultural resources in Berners Bay need to be investigated (i.e., the Shaman burial site, petroglyph sites, and village sites, Aukquan food, medicine and spirits buried at Lion Head Mountain).
HIS08	Historical and Archaeological Resources section needs to address direct, indirect, and cumulative effects, as well as any other applicable laws or regulations.
HIS09	The Lower Dewey Lake bench and KLGO as historic places and should be considered in the evaluation of alternatives.
HIS10	Consider the physical setting and character of towns historically connected by fjords and human heritage aspects.
HIS11	It should be taken into account that the Auk Kwaan recognize areas within the project area as their territory.

Hydrology

Statement Code	Summary
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HYD02	A hydrologic study is needed to determine the potential effects of structures at Berners Bay, the Katzeihin River, and other flood plains on channel morphology, and flood plain dynamics.
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Land Use

Statement Code	Summary
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LAN01	Land use designations should be updated using the latest Tongass Land Management Plan. This may require revisions to Figure 4-1 and P5-1.
LAN02	Alternative 2 (1997 DEIS) is a non-essential transportation corridor and would not be in compliance with LUD II guidelines. These areas are protected by roadless designation for exceptional wilderness and wildlife habitat.
LAN03	Use of LUD II land in Berners Bay is a 4(f) use, and feasible options have been declared, 1 and 4a.
LAN06	The discussion of how existing recreational and subsistence opportunities could change under a road based alternative needs to be expanded (especially Dewey Lake Trail System and areas that are dependent on wilderness).
LAN15	Discuss the destruction of old growth coastal temperate rainforest.

Landslides

Statement Code	Summary
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LNS01	The document does not adequately address landslide dangers in the corridor (i.e., frequency, mitigation, and cleanup cost).
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Miscellaneous

Statement Code	Summary
MSC11	Comments acknowledged.
MSC15	Discuss the safety of taking the ferry vs. driving.
MSC16	Consider the "move north" option for the capital.
MSC17	Consider the quality of experience for the resident or visitor separately (i.e., to not drive, to take the ferry). And safety in the cost/benefit analysis.
MSC18	Provide three dimensional visual representations of the cuts made for the road. Include weathered rock and vegetation of the slopes.
MSC19	Calculate the actual time spent traveling from Anchorage or Fairbanks to Juneau, with the road and without it.
MSC20	Request improvements in document organization.
MSC21	Evaluate impacts to local emergency services by the long distances and times involved in transporting injured patients.
MSC22	Discuss impacts on karst and caves on both the east and west sides.
MSC23	Put the alternatives up for vote in the southeast communities.
MSC24	Clarify whether or not there is an option to have both a road and a ferry system, and what happens to the AMHS if a road alternative is approved.
MSC25	Offer convenient air service from White Horse when Juneau Airport is closed due to weather.
MSC26	Comply with standards for environmental justice.

Mitigation

Statement Code	Summary
MIT08	Provide cost of restoring road to show how valuable the land is to southeast Alaska.

Noise

Statement Code	Summary
NOI01	The DEIS should expand the noise analysis for adding a new highway through a completely undeveloped area, include the quantity increase from present levels.

Operations

Statement Code	Summary
OPR01	The DEIS should discuss how emergency response and public safety needs would be handled along a road corridor and in the impacted communities (e.g., medical transport, accident response, towing). Include steps that will be taken to ensure people will not be stranded between two, or more, avalanches.
OPR02	The DEIS should discuss how the ADOT would maintain reasonable highway service during winter months when the road is closed due to avalanches and inclement weather. Include a projection of how many days the closures may take place and potential costs.
OPR03	The potential for shuttle ferry operation to Haines to be out of service for extended periods of time due to high winds should be taken into account. This time will increase with a ferry from Katzeihin. Discuss the projected reliability, time of year of closures (winter closures affect less people), and cost of more seaworthy vessels.
OPR05	Discuss the strategy to maintain the low growing plant buffer zone along the highway. The use of native plant materials and hydroseeding for revegetating slopes, to keep out invasive species, is recommended.

Operations

Statement Code Summary

- OPR07 Discuss the difference in upkeep costs between ferry options and road options.
- OPR08 Report the type and frequency of ferry service during each season under each alternative. Include options to Haines.

Purpose and Need

Statement Code Summary

- PRP04 The purpose and need should include construction costs, minimization of economic impacts and negative financial and operational impact to AMHS for year round and safe, reliable transportation.
- PRP05 The purpose and need should include the economic benefit to Juneau, Skagway and Haines (i.e., cruise ship tourism, independent travelers and commercial recreation).
- PRP06 The purpose and need should be based on safety, reliability, community and environmental health, in addition to cost and timeliness.
- PRP07 The purpose and need for a new road is not clear. Clarify the roads users and beneficiaries, tourists, summer resident or year round resident, and actual changes in travel between Fairbanks and Anchorage (i.e., people, time, reason).
- PRP08 Amend the 1997 DEIS to remove the inherent bias, especially toward the eastern road alternative, which the EPA believed permeated the purpose and need statement and rest of the document. Research and report on each alternative equally (include mailings that represent all benefits and costs of every alternative).
- PRP09 Include most environmentally preferable, improvement to quality of life, safe and reliable transportation and public transportation to the purpose and need.

Secondary and Cumulative Effects

Statement Code Summary

- SCC01 The Dewey Lakes system, Otter Creek and Lace River as well as future hydroelectric projects and the cost of producing energy need to be addressed in the analyses.
- SCC02 The analyses should address the potential for future mining operations in addition to the Kensington and Jualin mines.
- SCC04 The potential cumulative effects on wildlife, including threatened and endangered species, and the environment have not been adequately evaluated.
- SCC05 The secondary and cumulative impacts resulting from development and greater access should be considered in the evaluation (i.e., decreased wilderness). Discuss what types of development will be allowed.
- SCC07 Induced growth and increased vehicle use and their consequences on Juneau, Haines, and Skagway should be evaluated (social and political costs, unique qualities as well as air quality).
- SCC10 The indirect effects of increased noise from tourism activities associated with the road alternative needs to be addressed.
- SCC11 The potential for increased hunting and/or fishing with the road alternative and its impacts needs to be addressed.
- SCC13 Secondary effects on timber harvesting, mineral extraction, and road construction (allowed in TLMP) should be evaluated.
- SCC14 Cumulative effects for Berners Bay need to be further developed (e.g., NEPA compliance states a lead organization must write a cumulative EIS, which would apply to Kensington & Jualin mines and Goldbelt's Cascade Point development and Lace River hydro project. Also study cumulative effects of: log transfer facilities, increased hunting & fishing, harassment of endangered species, expansion of tourism and recreation, plans to control access to cultural sites in the area, etc.).
- SCC16 The possibility of increased homelessness, crime and pollution resulting from greater access in the impacted communities and along the roadway should be addressed in the analysis.

Secondary and Cumulative Effects

Statement Code Summary

SCC17	Impacts of increased recreational fishing and decreased/impacted fisheries habitat on the commercial fishing industry as a result of increased access under the road alternative need to be discussed.
SCC19	Discuss impacts to small tourism operators (i.e., guides).
SCC20	Unused
SCC21	Discuss cumulative impacts of the road and the activities it will bring over the life of the project to the entire project area.

SocioEconomics

Statement Code Summary

SEC02	The DEIS needs to discuss tourism statistics and the effects of a road on tourism.
SEC03	The DEIS needs to further analyze the economic impacts of alternatives on the communities of Juneau, Haines and Skagway (e.g., net loss/gain in jobs, mass transit system, sectors that will gain/lose, and year round barge/air/freight services).
SEC04	More information is needed concerning potential infrastructure needs in affected communities, Juneau in particular, due to increased numbers of visitors.
SEC05	The document should contain a detailed breakdown of information on construction, maintenance, and operation costs to enable verification and accuracy of costs to appropriate parties.
SEC07	Mitigation costs should be included in the total project cost.
SEC08	Maintenance costs should account for periodic major resurfacing, bridge repairs, etc., over the life of the project.
SEC10	The economic impacts to the AMHS due to the loss of revenue along Lynn Canal needs to be included in the analysis.
SEC13	The household survey questions were biased towards the road alternative. It should say, "Do you need a road?"
SEC17	The economic model is not appropriate for comparing different transportation modes such as ferries, roads and an air option. The economic analysis needs to be redone to equally compare each alternative and accordingly adjust the cost/benefit analysis.
SEC18	Sensitivity analysis should be applied to the user benefit study.
SEC19	The assumption that all walk-on ferry travelers count as being in vehicles inflates the cost for ferry travel.
SEC23	The DEIS does not adequately address the costs associated with avalanche mitigation and winter road maintenance for both the proposed highway and the existing highway. The costs should be reflected in the user benefit analysis. Include a percent confidence for the projected costs.
SEC24	The project should be built in phases so that it does not take more than its share of funds available for construction.
SEC25	The availability of money under the proposed funding source is questionable, as is the responsibility of taking it (i.e., Shakwak, bonds, private sources, and supplemental federal allocations).
SEC26	It is unclear if the costs for construction, equipment, operation and maintenance, staff and cumulative economic and social impacts (AS 44.45.020(a)(3)) were included for each road alternative economic analysis. Separate state and traveler cost.
SEC28	A discussion of increased fares for passenger, vehicle and peak season surcharge under the marine highway alternative should be evaluated so that it could be self supporting.
SEC30	The proposed toll has not been included as a user cost to travel the highway.
SEC34	The DEIS is outdated with regards to public opinion of the project and needs to be updated.

SocioEconomics

Statement Code Summary

SEC37	The AASHTO user benefit model was never intended to be applied to a new road in an undeveloped area, but rather to evaluate options within an existing road system. Thus, many costs such as degradation and loss of option were not accounted for.
SEC41	Discuss the road alternative's impact on funding, operations and maintenance of roads and facilities locally and in other parts of the state.
SEC46	The engineer's cost estimate appears to be for a highway length of 91 km, but the DEIS discusses a required highway length of 105 km (or possibly 110 km). Cost underestimates should be accounted for. Distances should be expressed in mile.
SEC48	Cost analysis of the alternatives should be done independently of Department of Transportation.
SEC49	Include information about state and federal government profits from the two mines and if the mines will contribute to road building costs.
SEC50	Lynn Canal system is the only section of the AMHS that comes close to paying for itself, a toll will not have a substantial impact.
SEC52	The cost of maintaining ferry docks in Juneau, Skagway and Haines, for emergency use, should be included in each of the road alternatives.
SEC53	Include the economic impact to Haines if it is excluded from a road link.
SEC54	Discuss effects on Petersburg and Wrangell since they may be connected to Juneau by ferry by the time the road is finished.
SEC55	Consider the potential to reduce the capital cost, in the near term, for any of the options.

Steller Sea Lions

Statement Code Summary

SSL01	Three Steller sea lion haulout areas are within the proposed East Lynn Canal corridor. What measures are proposed to minimize impacts to the haulouts?
SSL05	Study Steller sea lion reaction to humans.

Traffic

Statement Code Summary

TRA01	The DEIS overestimates traffic projections in the DEIS and should reflect actual traffic conditions.
TRA02	The traffic analysis should include estimates of tourist traffic, especially RV traffic, in Haines, Skagway, and Juneau under different alternatives.
TRA03	The traffic analysis needs to clarify or account for the discrepancy in estimated traffic volumes on the Klondike versus stated actual counts at the border.
TRA06	The potential for congestion on a highway during summer months as a result of discontinuing the mainline ferry should be addressed. Projected percentages of RV, heavy mining equipment, sightseers, etc. and their effect on the flow of traffic because of no pull offs, sharp curves and narrow lanes.
TRA11	Local traffic usage estimates are overstated, particularly because the survey did not mention the possibility of a toll when polling Juneau, Skagway, and Haines residents.
TRA12	Discuss the effects of losing the mass transit system on traffic, villages, tourists and people without cars (e.g., cost of bus travel, shuttle ferries, time needs and requirements to travel a road, and moving the ferry terminal from Auke Bay to Berners Bay).
TRA13	Fast ferries will increase frequency of trips and size of wake, which may abuse waterfront private property, beach erosion and wildlife habitat.
TRA14	Calculate the increased traffic due to curves which require no pass lanes for 70 percent of the road.

Visual

Statement Code	Summary
VIS03	The document should provide a clear description or graphic depictions of the proposed project that clearly represents the visual impacts.
VIS05	The visual impacts from bridges in Berners Bay and the Katzeihin areas needs to be addressed in the analysis.
VIS06	The visual impact of taking advantage of ridgelines and rock outcroppings for highway construction needs to be analyzed in the document. Discuss the effect the view of the road could have on cruise ship traffic.

Water Quality

Statement Code	Summary
WTR01	Potential water quality impacts resulting from road maintenance activities, fuel storage, Kensington Mine Maintenance Facility, or construction staging should be part of the analysis for all alternatives.
WTR06	Discuss the cost of removing construction debris from water, the alternative is an ocean discharge evaluation to determine degradation. Underwater cameras should survey the route and dive surveys should be done at hotspots.

Wetlands

Statement Code	Summary
WET01	It is recommended that hydrogeomorphic functions be used to assess slope (highway placement effects on subsurface/surface flow and water storage) and riverine (channel and water storage dynamics and energy dissipation) wetlands.
WET02	The DEIS pays little attention to individual wetlands and needs to provide a better assessment of wetland complexes and impacts to individual wetlands.
WET08	The DEIS does not identify the total acreage of impacts to wetlands and special aquatic sites within the Berners Bay area.
WET11	The length of the bridges spanning wetlands are shorter than some of the wetlands.
WET12	Explore the range of mitigation options for wetlands as there are new developments.

Wild & Scenic Rivers

Statement Code	Summary
RIV01	Would the development of the East Lynn Canal corridor preclude future consideration of the Lace and/or Antler Rivers as Wild & Scenic?
RIV03	Bridge spans are sometimes shorter than the crossings. Discuss methods to remedy this, and the impact environmentally and economically of filling.

Wildlife

Statement Code	Summary
WLD02	The choice of indicator species used in the study is questionable. The FEIS should include additional species comparable to the 13 species used by the Forest Service in the TLMP.
WLD06	Moving the road alignment to EIS-B in Berners Bay to avoid wetlands could exacerbate moose impacts. These impacts need to be better evaluated.
WLD09	The document should provide more information/discussion on goshawks, and the goshawk nests identified in the 1997 DEIS need to be identified on a map.
WLD10	The document does not evaluate potential impacts to Sitka black-tailed deer (i.e., winter and summer ranges, abundance, etc.).

Wildlife**Statement Code Summary**

WLD11	The potential effects of road operations, construction and avalanche mitigation on mountain goats and other wildlife are not discussed in the document.
WLD12	The DEIS needs to analyze impacts to goats and bears between Echo Cove and Sawmill Creek.
WLD13	The document does not provide information or potential effects to the Alexander Archipelago wolf (i.e., denning site locations, winter and summer distribution, etc.).
WLD14	The document should provide information on migratory bird use of the project area (i.e., species, periods of use, potential impacts, etc)
WLD16	Include tables or figures that compare, all species impacts, including threatened and endangered species, and habitat impacts, fragmentation and reductions (marine and land) for each of the wildlife species/habitat types between every project alternative.
WLD18	Unused
WLD20	Include information on Marbled Murrelet and owls.